

1 THE HONORABLE BARBARA ROTHSTEIN  
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10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON  
12 AT SEATTLE

13 WILDWOOD TOWNHOMES OWNERS  
14 ASSOCIATION, a Washington Non-Profit  
15 Corporation,

16 Plaintiff,

17 v.

18 AMERICAN FAMILY MUTUAL  
19 INSURANCE COMPANY, S.I., a Wisconsin  
20 Company; and DOE INSURANCE  
21 COMPANIES 1-10,

22 Defendants.

23 No.: 2:21-cv-01080-BJR

24 STIPULATED MOTION AND ORDER  
25 FOR CONTINUING DISCOVERY  
26 CUTOFF

27 Plaintiff Wildwood Townhomes Owners Association (the “Association”) and  
28 Defendant American Family Mutual Insurance Company, S.I. (“AmFam”) stipulate to this  
29 motion for a continuance of the discovery cutoff and respectfully request a short extension of  
30 the discovery cutoff by five days.

31 Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause  
32 and with the judge’s consent.” Good cause exists here because the parties are actively  
33 pursuing discovery in this matter but due to witness availability need a brief extension of the  
34 discovery cutoff to amicably schedule all necessary depositions. For purposes of judicial  
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36 STIPULATED MOTION AND ORDER  
37 FOR CONTINUING DISCOVERY CUTOFF- 1  
38 NO.: 2:21-CV-01080-BJR

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1 economy, the parties propose that the discovery cutoff be continued pursuant to the below  
 2 chart to enable both parties to complete the depositions of all witnesses. The parties  
 3 respectfully request that the Court extend the currently scheduled deadline as set forth below.  
 4 A proposed order is included herewith.

Event	Current Deadline	New Deadline
Discovery completed by	2/24/2023	3/1/2023

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 6 The Parties believe that there is good cause under Federal Rule of Civil Procedure  
 7 6(b) and Local Civil Rule 10(g) for a continuance of the discovery cutoff due to the reasons  
 8 set forth above.

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 10 DATED: February 7, 2023  
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Lane Powell PC  By: <u>/s/Brian Kiolbasa</u> Stephania Denton, WSBA #21920 dentons@lanepowell.com Brian Kiolbasa, Admitted Pro Hac Vice kiolbasab@lanepowell.com Attorneys for American Family Mutual Insurance Company, S.I.	Stein, Sudweeks & Stein, PLLC  By: <u>/s/Cortney Feniello</u> Jerry H. Stein, WSBA #27721 jstein@condodefects.com Justin D. Sudweeks, WSBA #28755 justin@condodefects.com Daniel J. Stein, WSBA #48739 dstein@condodefects.com Cortney M. Feniello, WSBA #57352 cfeniello@condodefects.com  Attorneys for Plaintiff Wildwood Townhomes Owners Association
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## ORDER

Based on the above Stipulated Motion, IT IS SO ORDERED that the discovery cutoff be extended as follows:

Event	Current Deadline	New Deadline
Discovery completed by	2/24/2023	3/1/2023

No other deadlines or events are altered.

IT IS SO ORDERED this 15th day of February, 2023.

Barbara J Rothstein

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## THE HONORABLE BARBARA J. ROTHSTEIN

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